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CHARLOTTE • RALEIGH • WILMINGTON • COLUMBIA

April 12, 2016

Via Email and U.S. Mail

Carrie L. DeVier
Herman & Whiteaker, LLC
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Columbia, SC 29205

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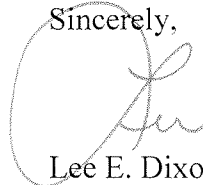
Robin E. Tuttle
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Bethesda, MD 20817

**RE: South Carolina Net, Inc. d/b/a Spirit Communications v. BellSouth
Telecommunications, LLC d/b/a AT&T Georgia, AT&T North Carolina, and
AT&T South Carolina
Civil Action No: 2016-79-C
Our File No: 00453L.00009**

Dear Counsel:

Enclosed and served on you, please find AT&T South Carolina's First Set of Discovery Requests to Spirit Communications.

Sincerely,



Lee E. Dixon



LED/aes
Enclosures

cc: Michael D. Baldwin
Thomas M. Payne
J. Tyson Covey
Jeffrey M. Nelson
Public Service Commission of SC

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

In Re: Complaint and Petition for Relief)	
Of South Carolina Net, Inc. d/b/a Spirit)	
Communications v. BellSouth)	Docket No. 2016-79-C
Telecommunications, LLC d/b/a AT&T)	
Georgia, AT&T North Carolina, and AT&T)	
South Carolina)	

**AT&T SOUTH CAROLINA’S FIRST SET OF
DISCOVERY REQUESTS TO SPIRIT COMMUNICATIONS**

Pursuant to Commission Rule 103-833, BellSouth Telecommunications, LLC d/b/a AT&T South Carolina hereby serves its first set of discovery requests on South Carolina Net, Inc. d/b/a Spirit Communications (“Spirit”). Given the accelerated schedule in this proceeding, please provide all responses on or before **Tuesday, April 19.**¹

INSTRUCTIONS

1. In answering these requests, please restate each request in full before stating your response thereto.
2. In answering these requests, furnish all information available to you or subject to your reasonable inquiry, including but not limited to information in the possession of your attorneys, accountants, advisors, or other persons directly or indirectly employed by, or connected with, you or your attorneys, and anyone else otherwise subject to your control.

¹ AT&T South Carolina does not believe that Spirit’s testimony and assertions regarding 911 interconnection “facilities,” as opposed to trunks, are relevant to the case or within the scope of Spirit’s Complaint. Given Spirit’s apparent belief that they are, however, AT&T South Carolina is entitled to ask discovery questions regarding 911 interconnection facilities (as opposed to trunks).

3. If a request cannot be responded to in full, respond to the extent possible, specify the reason for your inability to respond to the remainder, and produce all documents regarding the responded-to portion.

4. If you contend that any part of your response to a particular request contains trade secrets, other proprietary or confidential business or personal information, such contention shall not provide a basis for refusing to respond within the time required by the applicable discovery rule(s).

5. For each response to a request or portion thereof is withheld under a claim of privilege, provide a statement identifying: (a) the subject matter of the privileged information; (b) the privilege or immunity claimed and the facts giving rise thereto; and (c) if the privilege or immunity pertains to communications, the date and place of those communications as well as any and all participants in those communications.

6. If any request is objected to on grounds other than privilege or immunity, state in detail the basis for the objection.

7. The present tense includes the past and future tenses.

8. The use of the singular form of any word includes the plural and vice-versa.

9. Each of these requests shall be construed independently and shall not be limited by any other request.

10. The connectors “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request all responses that might otherwise be construed to be outside of its scope.

11. The adjectives “any” and “all” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the request all responses that might otherwise be construed to be outside of its scope.

DISCOVERY REQUESTS

1. Referring to the Direct Testimony of Michael D. Baldwin of Spirit at page 12, please (i) identify with specificity the “911 interconnection facilities” that Spirit contends it has asked AT&T South Carolina to disconnect during the time period relevant to this case, and (ii) provide copies of all orders placed by Spirit to AT&T South Carolina to disconnect “911 interconnection facilities” obtained from AT&T South Carolina during that period.

2. Referring to the Direct Testimony of Michael D. Baldwin of Spirit at page 12, please (i) identify with specificity the “911 interconnection trunks” that Spirit contends it has asked AT&T South Carolina to disconnect during the time period relevant to this case, and (ii) provide copies of all orders placed by Spirit to AT&T South Carolina to disconnect “911 interconnection . . . trunks” obtained from AT&T South Carolina during that period.

3. Referring to the Direct Testimony of Michael D. Baldwin of Spirit at page 12, please provide copies of all documents showing that AT&T South Carolina has rejected an order placed by Spirit to disconnect “911 interconnection facilities” during the time period at issue in this case.

4. Referring to the Direct Testimony of Michael D. Baldwin of Spirit at page 12, please provide copies of all documents showing that AT&T South Carolina has rejected an order placed by Spirit to disconnect “911 interconnection . . . trunks” during the time period at issue in this case.

5. Referring to the Direct Testimony of Michael D. Baldwin of Spirit at page 13, please provide copies of all bills that AT&T South Carolina has sent to Spirit for (i) “911 interconnection facilities,” and (ii) “911 interconnection . . . trunks” that form the basis for Spirit’s monetary claim in this proceeding.

6. Is it Spirit’s understanding that “911 interconnection facilities” and “911 interconnection . . . trunks” are two different things? If so, please explain Spirit’s understanding of the difference. If not, please explain why Spirit believes they are the same thing.

7. Referring to the Direct Testimony of Michael D. Baldwin of Spirit at page 13, where Mr. Baldwin claims that AT&T South Carolina bills Spirit for 911 interconnection “trunks,” please fully explain the basis for Spirit’s claim that AT&T South Carolina bills it for 911 interconnection trunks and provide all documents on which Spirit relies as the basis for that claim.

8. Please provide all of Spirit’s written internal communications, including but not limited to emails and including any emails or memoranda to or from Mr. Baldwin or Mr. Covington, regarding the matters at issue in this Complaint.

9. Please provide all communications, including emails, between Spirit and AT&T South Carolina or any AT&T employee regarding the matters at issue in this Complaint.

10. Please provide all communications, including emails, between Spirit and Linda Lloyd of CHR Solutions regarding the matters at issue in this Complaint, including Spirit’s alleged attempts to disconnect “911 interconnection facilities” or “911 interconnection . . . trunks” obtained from AT&T South Carolina.

11. Referring to the Direct Testimony of Michael D. Baldwin of Spirit at page 12, where Mr. Baldwin states that Spirit “transport[s] 911 traffic to AT&T’s 911 Selective Routers

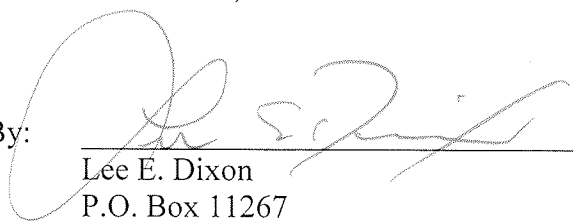
over Bandwidth's 911 interconnection facilities and trunks," do Bandwidth's "facilities and trunks" connect directly from Spirit's switch to AT&T South Carolina's selective routers? Do they connect directly from Spirit's switch to AT&T ILEC selective routers in other states? If there is not a direct connection, please explain in detail the routing of Spirit's 911 traffic to AT&T selective routers using Bandwidth's facilities and trunks.

12. Please provide copies of Spirit's interconnection agreements for South Carolina with CenturyLink, Frontier, and Windstream, which are referenced in the Direct Testimony of Mr. Covington.

13. Regarding the amount of refunds sought (see Baldwin Direct at 16), please specify whether that amount is for charges only in South Carolina, or if it also includes charges incurred for Georgia and North Carolina. If it includes charges incurred for Georgia and North Carolina, please specify the amount incurred for charges in Georgia and North Carolina.

14. Under Spirit's contract with Bandwidth, please specify how much Spirit paid Bandwidth for 911 interconnection trunks and/or facilities used to deliver traffic to AT&T South Carolina during the time period at issue in the Complaint.

**HEDRICK GARDNER KINCHELOE &
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By: 

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Attorney for Defendants

April 12, 2016
Columbia, South Carolina

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing **AT&T South Carolina's First Set of Discovery Requests to Spirit Communications** has been served upon the following by United States mail, first-class postage pre-paid, addressed as shown below on the 12th day of April, 2016.

Michael D. Baldwin, Vice President, Business & Legal Affairs
South Carolina Net, Inc. d/b/a Spirit Communications
Spirit Communications
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